

From: [Tillotson, Elizabeth](#)
To: [Houlihan, Damien](#); [Gaito, Danielle](#)
Cc: [Palmer, Allan](#)
Subject: RE: Schiller Screens - re: NPDES permit No. NH0001473
Date: Friday, September 04, 2020 5:36:46 PM

Hopefully, folks received this info in an outlook calendar invite and can ignore this email.
That said I wanted to confirm the number for everyone.

I hope you all enjoy the perfect weather for the upcoming Labor Day weekend.

[Elizabeth Tillotson](#) is inviting you to a scheduled Zoom meeting.

Topic: Discussion w EPA re Schiller Station NPDES permit
Time: Sep 9, 2020 02:30 PM Eastern Time (US and Canada)

[Join Zoom Meeting](#)

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Find your local number: (b) (6)

From: Tillotson, Elizabeth
Sent: Monday, August 31, 2020 4:57 PM
To: 'Houlihan, Damien' <houlihan.damien@epa.gov>; 'Gaito, Danielle' <Gaito.Danielle@epa.gov>
Cc: Palmer, Allan <Allan.Palmer@graniteshorepower.com>
Subject: RE: Schiller Screens - re: NPDES permit No. NH0001473

I have enabled audio and video but appreciate that you may only join via audio.

Elizabeth Tillotson is inviting you to a scheduled Zoom meeting.

Topic: Discussion w EPA re Schiller Station NPDES permit
Time: Sep 1, 2020 02:30 PM Eastern Time (US and Canada)

Join Zoom Meeting

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Meeting ID: (b) (6)

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Find your local number: (b) (6)

From: Tillotson, Elizabeth

Sent: Monday, August 31, 2020 4:30 PM

To: Houlihan, Damien <houlihan.damien@epa.gov>; Gaito, Danielle <Gaito.Danielle@epa.gov>

Cc: Palmer, Allan <Allan.Palmer@graniteshorepower.com>

Subject: RE: Schiller Screens - re: NPDES permit No. NH0001473

GSP is not using Microsoft Teams. We are using Zoom w video and/or audio. I will send an invite and if you participate by phone only – that should be fine.

Thanks for the quick availability.

Lynn

From: Houlihan, Damien [<mailto:houlihan.damien@epa.gov>]

Sent: Monday, August 31, 2020 4:23 PM

To: Tillotson, Elizabeth <Elizabeth.Tillotson@graniteshorepower.com>; Gaito, Danielle <Gaito.Danielle@epa.gov>

Cc: Palmer, Allan <Allan.Palmer@graniteshorepower.com>

Subject: RE: Schiller Screens - re: NPDES permit No. NH0001473

*** Exercise Caution - External Email ***

Ok. Danielle and I are available tomorrow at 2:30. Please send us a calendar invite, preferable using Microsoft Teams. If that doesn't work for you, a conference line is fine. Thanks.

Damien

*Damien Houlihan, Chief
Industrial Permits Section
US EPA*

617 918-1586

From: Tillotson, Elizabeth <Elizabeth.Tillotson@graniteshorepower.com>
Sent: Monday, August 31, 2020 4:17 PM
To: Houlihan, Damien <houlihan.damien@epa.gov>; Gaito, Danielle <Gaito.Danielle@epa.gov>
Cc: Palmer, Allan <Allan.Palmer@graniteshorepower.com>
Subject: RE: Schiller Screens - re: NPDES permit No. NH0001473

Good question Damien. If we can get the technical folks together in short order, I think there is benefit to discussing the key items that are different than anticipated by the permit, open issues and what that might mean for available next steps. With those identified I would expect we will attempt to layout out a plan to move forward including any legal input.

I hope that works, but open to other suggestions.
Thanks Lynn

From: Houlihan, Damien [<mailto:houlihan.damien@epa.gov>]
Sent: Monday, August 31, 2020 4:01 PM
To: Tillotson, Elizabeth <Elizabeth.Tillotson@graniteshorepower.com>; Gaito, Danielle <Gaito.Danielle@epa.gov>
Cc: Palmer, Allan <Allan.Palmer@graniteshorepower.com>
Subject: RE: Schiller Screens - re: NPDES permit No. NH0001473

*** Exercise Caution - External Email ***

Ok, I'll check our availability and get back to you.

At some point we will need to involve our lawyers. Do you prefer this first meeting to just include technical, and then we'll figure out next steps? Let me know. Thanks.

Damien

*Damien Houlihan, Chief
Industrial Permits Section
US EPA*

617 918-1586

From: Tillotson, Elizabeth <Elizabeth.Tillotson@graniteshorepower.com>
Sent: Monday, August 31, 2020 3:51 PM
To: Houlihan, Damien <houlihan.damien@epa.gov>; Gaito, Danielle <Gaito.Danielle@epa.gov>
Cc: Palmer, Allan <Allan.Palmer@graniteshorepower.com>
Subject: RE: Schiller Screens - re: NPDES permit No. NH0001473

Good afternoon all.

Allan and I are available:

This week – Tuesday (tomorrow) sep1 after 2:30 pm.

Wednesday sep2 – available 9 – 12 and after 2:30

Next week - Wednesday sep9 – available 9 – 12 and after 2:30

If those do not work, please offer your suggestions.

Thank you.

Lynn

From: Tillotson, Elizabeth
Sent: Monday, August 31, 2020 9:20 AM
To: Houlihan, Damien <houlihan.damien@epa.gov>; Gaito, Danielle <Gaito.Danielle@epa.gov>
Cc: Palmer, Allan <Allan.Palmer@graniteshorepower.com>
Subject: RE: Schiller Screens - re: NPDES permit No. NH0001473

Thank you Damien. Agreed. I will talk to Allan and offer a few times in the next week or so that work for us.

Thanks Lynn

Lynn Tillotson | Executive Director | Granite Shore Power | 603.230.7968 |
Elizabeth.tillotson@graniteshorepower.com

From: Houlihan, Damien [<mailto:houlihan.damien@epa.gov>]
Sent: Monday, August 31, 2020 7:59 AM
To: Tillotson, Elizabeth <Elizabeth.Tillotson@graniteshorepower.com>; Gaito, Danielle <Gaito.Danielle@epa.gov>
Cc: Palmer, Allan <Allan.Palmer@graniteshorepower.com>
Subject: RE: Schiller Screens - re: NPDES permit No. NH0001473

*** Exercise Caution - External Email ***

Thanks, Lynne. We would like to set up a meeting per your request. I think we could get everyone

together for a 1 hour meeting either this week or next. Please let me know your availability.

Damien

*Damien Houlihan, Chief
Industrial Permits Section
US EPA*

617 918-1586

From: Tillotson, Elizabeth <Elizabeth.Tillotson@graniteshorepower.com>
Sent: Saturday, August 29, 2020 10:07 PM
To: Houlihan, Damien <houlihan.damien@epa.gov>; Gaito, Danielle <Gaito.Danielle@epa.gov>
Cc: Palmer, Allan <Allan.Palmer@graniteshorepower.com>
Subject: FW: Schiller Screens - re: NPDES permit No. NH0001473

Damien and Danielle – Please allow this email to serve as a summary of the steps GSP Schiller LLC has taken consistent with NPDES permit No. NH0001473 and specifically Part I.A.11.b.1. Design:

- I.A.11.b.1.i – Pilot testing design and equipment installation completed
- I.A.11.b.1.ii – Pilot testing of WWS completed
- I.A.11.b.1.iii – Requested and received approval of a minor modification to schedule for submitting the demonstration reports documenting the results of the pilot testing
 - 7.30.2020 Submitted Wedgewire Screen Reports noting both 0.8mm and 3.0 mm WWS did not perform as anticipated during the pilot testing
- Since that time we have:
 - Confirmed prior discussions with EPA that all the Schiller units remain in an extended outage with ISO-NE
 - Requested a meeting with appropriate EPA personnel to discuss modifying the Permit due to the circumstances
 - Talked to the permit writer who redirected to other staff personnel for discussion
 - Left voicemail for suggested EPA staff (8.18.20)
 - Followed up with email to EPA Staff (8.21.20)
- I.A.11.b.1.iv and v. – Awaiting response from EPA and meeting regarding next steps. GSP Schiller has collected data outlined in subpart iv. and is confident that, should it be determined that additional data is needed after discussions with EPA, it can be collected and provided in a reasonable time period.

COVID-19 has presented and continues to present unique challenges. I know you and your teams have been impacted. GSP Schiller has, as well, and we appreciate the agency's attention to this matter. Please contact me or Allan at your earliest convenience.

Thank You.

Lynn

Lynn Tillotson

From: Palmer, Allan
Sent: Friday, August 21, 2020 3:16 PM
To: Gaito, Danielle <Gaito.Danielle@epa.gov>
Cc: Houlihan, Damien <houlihan.damien@epa.gov>; Tillotson, Elizabeth <Elizabeth.Tillotson@graniteshorepower.com>
Subject: Schiller Screens

Danielle, Not sure if you got my voicemail, but I'm going to take next week off so I wanted to touch base before I go. As you may have seen from our reports, the wedgewire screen test results fell far short of expectations, particularly with regard to fouling and physical failure. Coupled with the fact that operations at the station have been suspended for at least the time being, there is no justification to continue with the plan to install wedgewire screens. As offered in our cover letter to the reports, GSP requests a meeting with appropriate parties to discuss potential modifications to Schiller's 316(b) compliance plan given the significance of this new information.

We appreciate your consideration, please direct your response to Lynn given I will be Wi-Fi-free until September.

Thank you, Allan.

Granite Shore Power LLC
431 River Road
Bow, N.H. 03304
(603) 230-7951

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